

We are among the many small educational stations in the country run by schools. Our staff consists of students, our budget is bare sale. We do not have now, nor do we have hope in the future of acquiring, the equipment necessary to record every hour of every day of broadcast. We are still largely an analog facility. Requiring us to develop and maintain an omniscient recording mechanism is an undue hardship technically and financially. Additionally, the amount of storage space needed to house thousands of reels, or even cassettes, of daily programming would be ridiculous in our 10 by 10 studio, let alone the aspect of maintaining an orderly inventory of what is on the tapes. I firmly believe that if the commission wants to monitor content, then it should reinstate its own monitoring system, or simply continue to rely on citizen reports. Legally, the burden of proof in any court proceeding is always on the plaintiff and the prosecution. Requiring every mom and pop small station to maintain an expensive defense that they don't need is not fair, not in the spirit of American law, and extremely bizarre when contrasted with the commission's ineffectiveness on the issues of third adjacent interference from LPFM and corporate consolidation of media resources.

Regards,

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